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CONSTITUTIONAL LAW—INTERPRETATION OF STATUTES—LEGISLATIVE INTENT—PUBLIC OFFICERS—PEOPLE EX REL MITCHELL V. STURGES, 51 N. E. Rep. (N. Y.) 295.—Laws 1895 c. 247, amending the Charter of Saratoga Springs, requires the president to be appointed by trustees, instead of elected by the village

* * * provides that the term of office of the incumbent should be vacant on the appointment of another by the trustees. *Held*, Parker, C. J., and O'Brien, J., dissenting that latter clause, providing that the term of incumbent should be vacant on the appointment of another by the trustees, does not invalidate act, and further, that there is nothing to show that the Legislature intended to affect the president rather than his office, thereby rendering it repugnant to a constitutional provision forbidding the deprivation of a right or privilege "unless by the law of the land."

CONSTITUTIONAL LAW—JURISDICTION—REGULATION OF HOURS OF WORK—UNITED STATES V. SAN FRANCISCO BRIDGE CO., 88 Fed. Rep. 891.—Congress has power to regulate the hours of labor which may be required or permitted on public buildings or works of the United States and the federal courts have jurisdiction to punish violators of such regulations, though the buildings or works where committed may be situated on land within the political jurisdiction of a State. *Cf. Holden v. Hardy*, YALE LAW JOURNAL, vol. 7, 316.

CORPORATIONS—FOREIGN—LIABILITIES OF STOCKHOLDERS—EXCLUSIVENESS OF REMEDY—STODDARD V. LUM ET AL. 53 N. Y. Supp. 607. Starr & C. Ann. St. Ill. c. 32 par. 8, provides that a stockholder's liability for unpaid stock shall be enforced "in the manner herein provided." Further, if a corporation shall cease doing business, leaving debts, suits in equity may be brought against all stockholders by joining the corporation; that each stockholder shall pay his pro rata share of such debts to the extent of the unpaid portion of his stock, after exhausting the assets of the corporation * * * and that courts of equity shall have power to close up the corporate business, and to appoint a receiver who shall be a resident of Illinois. * * * who shall have authority to sue in all Courts and do all things necessary in closing up the corporation's affairs. Under these sections it was *held* that the remedy so provided is exclusive, and therefore an assignee for creditors of a corporation cannot enforce the stockholders liabilities. It was further held that such remedy can properly be enforced in the Courts of Illinois alone, and that therefore the Courts of New York will not take jurisdiction. Green and Follett, J. J., dissenting.

CRIMINAL LAW—SECOND OFFENCE EVIDENCE—DUE PROCESS OF LAW—PRESUMPTION OF INNOCENCE.—PEOPLE V. SICKLES, 51 N. E. Rep. (N. Y.) 288. The defendant was indicted for the crime of robbery in the first degree, as a second offence, Penal Code, § 688, provides for an increased penalty for the commission of a felony after a former conviction. *Held*, that proof of such former conviction upon the trial, and before conviction of the second offence, is not objectionable as not being due process of law, or as depriving the defendant of the benefit of the presumption of innocence. Bartlett, J., dissented, on the ground that such proof of former conviction does not become material until after the second conviction, and thus only for the purpose of enabling trial judge to impose the proper term of imprisonment. He further held that to allow such proof was to convict without due process of law.

DAMAGES—INJURIES RESULTING IN DEATH—RIGHT OF PARENT TO RECOVER—AMOS V. ATLANTA RY. CO., 31 S. E. 42 (Ga.).—In Georgia under the principles of the common law a parent can recover the loss of services of a child